

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF MICHIGAN**

**FEDERAL TRADE COMMISSION,**

Plaintiff,

v.

**FINANCIAL EDUCATION  
SERVICES, INC., *et al.*,**

Defendants.

Case No. 2:22-cv-11120-BAF-APP

Hon. Bernard A. Friedman

**FTC’S NON-OPPOSITION TO MONITOR’S FIRST MOTION FOR  
ORDER APPROVING AND AUTHORIZING PAYMENT OF MONITOR’S  
AND PROFESSIONAL’S FEES AND COSTS**

Plaintiff, the Federal Trade Commission (“FTC”), through its undersigned counsel, respectfully submits this statement of non-opposition to the Monitor’s First Motion for Order Approving Payment of Monitor’s and Professional’s Fees and Costs (“Fee Motion”). (ECF No. 89.)

The FTC submits that the services the Monitor rendered during the course of the first application period of the monitorship were necessary, appropriate, and brought value to the monitorship. The FTC has carefully reviewed the Fee Motion, the Declaration of the Monitor Patrick Miles, Jr. in support of the Fee Motion and the invoices submitted therewith. (ECF No. 89-1.) Based on its review, the FTC believes the requests are reasonable and has no objection to the Monitor’s request

for the Court's approval to pay the fees and costs of the Monitor and his professionals.

Dated: September 29, 2022

Respectfully submitted,

/s/Gregory A. Ashe

GREGORY A. ASHE

K. MICHELLE GRAJALES

JULIA E. HEALD

Federal Trade Commission

600 Pennsylvania Avenue NW

Washington, DC 20580

Telephone: 202-326-3719 (Ashe)

Telephone: 202-326-3172 (Grajales)

Telephone: 202-326-3589 (Heald)

Facsimile: 202-326-3768

Email: gashe@ftc.gov, mgrajales@ftc.gov,  
jheald@ftc.gov

DAWN N. ISON

United States Attorney

SUSAN K. DECLERCQ (P60545)

Assistant United States Attorney

211 W. Fort Street, Suite 2001

Detroit, MI 48226

Telephone: 313-226-9149

Email: susan.declercq@usdoj.gov

Attorneys for Plaintiff

FEDERAL TRADE COMMISSION

### **CERTIFICATE OF SERVICE**

The undersigned hereby certifies that on September 29, 2022, a true and correct copy of **FTC’S NON-OPPOSITION TO MONITOR’S FIRST MOTION FOR ORDER APPROVING PAYMENT OF MONITOR’S AND PROFESSIONAL’S FEES AND COSTS** was filed electronically with the United States District Court for the Eastern District of Michigan using the CM/ECF system, which sent notification to all parties of interest participating in the CM/ECF system.

/sGregory A. Ashe

Attorney for Plaintiff Federal Trade Commission